

Eva M. Ciko, Esquire (EC-0944)
Joanna A. Diakos, Esquire (JD-7269)
KIRKPATRICK & LOCKHART LLP
599 Lexington Avenue
New York, New York 10022-6030
Telephone: (212) 536-3900
Facsimile: (212) 536-3901

Jerry S. McDevitt, Esquire
Lucas G. Paglia, Esquire
KIRKPATRICK & LOCKHART LLP
Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, Pennsylvania 15222
Telephone: (412) 355-6500
Facsimile: (412) 355-6501
Attorneys for Plaintiff
World Wrestling Entertainment, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
WORLD WRESTLING
ENTERTAINMENT, INC.,

Plaintiff, -----:

v. -----:

VARIOUS JOHN AND JANE DOES,
and VARIOUS XYZ CORPORATIONS, -----:

Defendants. -----X

JUDGE CHIN

04 CV 01897

Civil Action No. 04 CV 01897

**VERIFIED COMPLAINT
AND JURY DEMAND**

Filed Under Seal

Plaintiff World Wrestling Entertainment, Inc., including its subsidiaries (collectively, "WWE"), by and through its attorneys, Kirkpatrick & Lockhart LLP, alleges the following for its Complaint against Defendants John and Jane Does and XYZ Corporations.

NATURE OF THE CASE

1. This is an action for trademark infringement, counterfeiting and dilution under the Lanham Act, 15 U.S.C. § 1051, *et seq.*, including the Trademark Counterfeiting Act of 1984, 15 U.S.C. § 1116(d), and related state law claims for trademark infringement, trademark dilution and unfair competition occasioned by Defendants' unlawful manufacture, distribution and/or sale of counterfeit merchandise bearing unauthorized copies of WWE's registered and unregistered trademarks and service marks. WWE brings this action to (i) protect its reputation for distributing and selling merchandise of the highest quality and grade; (ii) prevent deception of the consuming public by Defendants; and (iii) avoid thousands of irreconcilable lost sales.

2. To achieve these goals, through an *Ex Parte* Application for TRO and Order for Seizure of Counterfeit Marked Goods filed concurrently herewith and incorporated herein by reference, WWE seeks an order from this Court authorizing the seizure of:

- (i) all counterfeit merchandise bearing any of WWE's registered and/or unregistered marks or any confusingly similar marks found in the possession, custody or control of Defendants;
- (ii) any means of making such counterfeit merchandise; and
- (iii) all records documenting the manufacture, receipt, distribution, offering for sale or sale of such counterfeit merchandise.

WWE seeks to have all such counterfeit merchandise and associated documents and materials seized until a hearing can be held before this Court to determine the disposition of any such goods, materials and/or documents seized.

3. WWE also seeks a TRO and a preliminary and permanent injunction barring Defendants from unlawfully infringing WWE's registered and unregistered trademarks during WWE's Wrestlemania[®] XX weekend and related activities and events, which formally begin

on March 13, 2004, in New York City with the WWE Hall of Fame Reception and Induction Ceremony event at the Midtown Hilton, by manufacturing, distributing and/or selling counterfeit merchandise bearing any of WWE's registered or unregistered marks or any other word or name that is likely to cause confusion or mistake or to deceive.

PARTIES

4. Plaintiff WWE is a Delaware corporation having its principal place of business at 1241 East Main Street, Stamford, Connecticut 06902.

5. Defendants John and Jane Does and XYZ Corporations, whose precise identities are not yet known to WWE, are individuals and entities who, at all times relevant hereto, have been doing business and continue to do business in the Southern District of New York.

JURISDICTION AND VENUE

6. This Court has personal jurisdiction over the Defendants because they reside in and/or have transacted business in this State, and have caused harm or tortious injury in this State by acts within this State.

7. This Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. § 1338(a) and (b). This Court has supplemental jurisdiction, pursuant to 28 U.S.C. § 1337(a), with respect to the state law claims asserted herein.

8. This Court is an appropriate venue for this action under 28 U.S.C. § 1331(a)(2), because a substantial part of the events giving rise to plaintiff's request for relief occurred and continue to occur in this district.

FACTUAL BACKGROUND

A. WWE's Business And Marks

9. Since at least as early as February 1983, WWE, first doing business as the "World Wrestling Federation" and now doing business as "World Wrestling Entertainment," has provided to the public live and televised wrestling and entertainment events and services (the "WWE Wrestling Services") under the service mark WORLD WRESTLING ENTERTAINMENT®. In connection therewith, WWE has used, advertised, publicized, and presented the WWE Wrestling Services, and related souvenirs, merchandise, memorabilia, and videotapes ("WWE Merchandise") under the WORLD WRESTLING ENTERTAINMENT® mark and numerous other service marks and trademarks (collectively the "WWE Marks"). A listing of the WWE Marks, both those registered with the United States Patent and Trademark Office and those unregistered but exclusively owned by or licensed to WWE, is set forth as Exhibits 1 and 2 hereto, respectively. Among the most important of those marks to this action are:

<u>Mark</u>	<u>Registration Nos.</u>
WORLD WRESTLING ENTERTAINMENT	2,772,677 2,757,600 2,757,599 2,754,499
WWE	2,772,683
WWE logos	2,799,228 2,751,436 2,765,751 2,757,597 2,754,495 2,757,596
WRESTLEMANIA	1,432,884 1,716,716 1,863,534 2,625,125

The WWE Marks are well known to the public and have come to identify WWE to the public as the genuine source and sponsor of WWE Wrestling Services and WWE Merchandise.

10. WWE promotes live wrestling entertainment events on a regular basis in most major cities in the United States and in many other cities throughout the world ("Live Events"). WWE does this by organizing tours of Live Events throughout the country. Most major U.S. cities will have a WWE Live Event appear in their city at least once or twice a year. WWE Live Events include all of the following types of programs: pay-per-views; live, nationally-televised shows; television tapings; and non-televised events, known as "house shows." In addition to generating revenues through ticket sales and promoting the up-coming pay-per-views, WWE sells a significant portion of WWE Merchandise at its Live Events.

11. WWE presents regular World Wrestling Entertainment programs featuring live wrestling events on a pay-per-view basis twelve (12) times a year. One of these pay-per-view events is called "Wrestlemania®" and typically sells for \$39.95 per view. Wrestlemania is WWE's showcase live event and most lucrative pay-per-view program. The remaining eleven WWE pay-per-view events, with various names, sell for \$34.95 each.

12. WWE's pay-per-view events are the biggest wrestling events of the year for World Wrestling Entertainment and offer an occasion for, inter alia, determining and crowning World Wrestling Entertainment's various champions and/or elucidating the various story lines developed by WWE throughout the year. These live pay-per-view events are extensively promoted and widely attended and viewed.

13. For example, the first Wrestlemania, Wrestlemania I, was held March 31, 1985, at Madison Square Garden in New York City. Subsequent Wrestlemanias have occurred

in such sites as the Pontiac Silverdome in Pontiac, Michigan (Wrestlemania III), which drew over 90,000 spectators; Atlantic City, New Jersey (Wrestlemanias IV and V); and Indianapolis, Indiana (Wrestlemania VII). The 2002 Wrestlemania at the Skydome in Toronto drew over 68,000 spectators and over one million pay-per-view customers. Most recently, the 2003 Wrestlemania held at Safeco Field Arena in Seattle drew over 54,000 spectators and over 500,000 pay-per-view customers.

14. On March 29, 1998, WWE held its annual Wrestlemania pay-per-view event, Wrestlemania XIV, at the Fleet Center in Boston, Massachusetts. WWE Merchandise sales at Wrestlemania XIV set a record for the Fleet Center for sales per capita. Similarly, WWE held Wrestlemania XVI at the Pond in Anaheim, California, on April 2, 2000, again setting a venue record for merchandise sales per capita and drawing a pay-per-view audience of over 800,000 viewers.

15. On March 17, 2002, WWE held Wrestlemania XVII at the Skydome in Toronto, Canada, averaging over \$18.00 per attendee in merchandise sales.

16. In addition to its pay-per-view Live Events, WWE currently presents two two-hour weekly World Wrestling Entertainment programs called "RAW[®]" and "Smackdown!TM", that feature wrestling entertainment programming every Monday and Thursday night nationwide on the Spike TV cable television network and the UPN, respectively. RAW[®] is cablecast live from various WWE events around the country, and Smackdown!TM is cablecast from pre-recorded live WWE events. WWE also presents three other weekly wrestling entertainment programs on Spike TV, "HeatTM," "VelocityTM" and "ConfidentialTM." In addition, WWE also presents two other nationally syndicated WWE television programs each week: "After BurnTM" and "Bottom LineTM."

17. At and in connection with its Live Events, as well as in retail stores nationwide and via mail order and on-line catalogs, WWE sells a large variety of the WWE Merchandise featuring the WWE Marks. The WWE Merchandise typically displays prominently the name and logo of the company, its events, its programs, and/or the wrestlers and other personalities involved with the events and programs. Examples of the WWE Merchandise are listed in Exhibit 3 attached hereto, but primarily include, without limitation, T-shirts, jerseys, sweatshirts, caps, hats, belts, sunglasses, key rings, action figures, posters, and videotapes.

B. Counterfeiting At Previous Live Events

18. Based upon information and belief, as well as investigation into the matter, WWE learned that certain individuals and entities, alone and in conjunction with other, similarly situated individuals and entities, were selling goods of inferior quality to those sold, or licensed for sale, by WWE at or near the Live Events. These goods, which were marked with imitations or counterfeits of the WWE Marks ("Counterfeit Merchandise"), included, *inter alia*, T-shirts, sweatshirts, caps, hats, key rings, posters, videotapes and other souvenirs, merchandise and memorabilia.

19. At no time has WWE authorized any individuals or entities to manufacture, distribute, offer for sale or sell any Counterfeit Merchandise, nor any WWE Merchandise or goods or materials bearing the WWE Marks that were not specifically licensed and approved by WWE, at Live Events or elsewhere.

20. As described more fully in the Declaration of Donna Goldsmith, attached to Plaintiff's Ex Parte Application for Temporary Restraining Order and incorporated herein by reference, WWE has undertaken, and continues to undertake significant, extensive measures to guard against the unauthorized distribution and sale of Counterfeit Merchandise at Live Events.

21. Based upon its investigation into the matter, and as described more fully in the Declaration of Donna Goldsmith, and in the Declaration of Wayne Grooms also attached to Plaintiff's Ex Parte Application for Temporary Restraining Order and incorporated herein by reference, WWE observed that the design, materials and quality of most of the Counterfeit Merchandise being distributed and sold at WWE Live Events throughout the United States was poor and uniform from event to event and city to city. WWE concluded that the individuals and entities distributing and selling Counterfeit Merchandise were part of a concerted operation who travel from venue to venue selling unauthorized Counterfeit Merchandise likely acquired from common sources of manufacture.

22. WWE thus determined that, without the aid of a federal court order authorizing seizure of Counterfeit Merchandise, WWE would be unable to combat the network of individuals and entities distributing and selling unauthorized Counterfeit Merchandise throughout WWE's nationwide series of Live Events and thus unable effectively to protect its rights, and the rights of the consuming public, against the unauthorized and unlawful distribution and sale of Counterfeit Merchandise at Live Events.

23. Accordingly, in connection with its 2002-2003 nationwide series of live WWE events – which included Live Events in this district on June 29, 2002 and November 17, 2002 and in the greater New York City area on no fewer than 10 occasions – and based upon the pervasive bootlegging problem described above, WWE commenced an *ex parte* action in the Eastern District of New York (the “2002 Action”). As a result of the 2002 Action, WWE obtained a Temporary Restraining Order (and, subsequently, a Preliminary Injunction Order) and Order of Seizure (“the Seizure Order”) prohibiting the distribution and sale of counterfeit marked goods and authorizing the seizure of such goods at Live Events throughout the 2002-03 season.

24. Pertinent pleadings and Court Orders from the 2002 Action, as well as earlier ex parte seizure actions prosecuted by WWE, are available upon request.

25. As demonstrated by the Declaration of Wayne Grooms, throughout its past several seasons of Live Events, WWE has encountered numerous sellers of Counterfeit Merchandise at various locations throughout the United States, including in this district, serving each offending seller with official notice and seizing Counterfeit Merchandise pursuant to the applicable Orders of Seizure.

26. During the course of WWE's enforcement of the Seizure Order, and prior similar orders, WWE seized thousands of counterfeit T-shirts, caps, posters, pictures and other items of Counterfeit Merchandise marked with imitations of the WWE Marks. As a result of WWE's ability to seize Counterfeit Merchandise, WWE was able to avoid lost sales in excess of \$320,000, as well as irreparable injury to WWE's reputation and goodwill with the consuming public. See Declaration of Donna Goldsmith at ¶ 15.

27. Pursuant to the Seizure Order in the 2002 Action, WWE posted bond and proceeded at all times with the utmost caution in seizing only those goods that WWE's security team determined to be Counterfeit Merchandise. WWE enforced the Order of Seizure in a manner designed to protect its trademarks and service marks without compromising the rights of the Defendants in that action.

28. None of the Defendants in that action identified himself upon being apprehended, nor did any of them accept service or come forward with objections to the court. Such behavior is typical of counterfeiters who distribute and sell unauthorized merchandise at live entertainment events. See Declaration of Wayne Grooms at ¶ 23.

29. The Seizure Order issued in the 2002 Action enabled WWE to effectively police distribution and sale of Counterfeit Merchandise throughout WWE's 2002-2003 series of Live Events. The Defendants' conduct, however, represents a continuing problem, not yet abated, and the only effective relief available to WWE is the ex parte seizure process.

30. Without the ability to seize Counterfeit Merchandise at and near Madison Square Garden during and in connection with its Wrestlemania® XX event, WWE stands to lose untold and irrecoverable sums in merchandise sales and suffer incalculable, irreparable damage to its reputation and goodwill in addition to the harm such counterfeiting will cause to the consuming public.

C. Expected Counterfeiting At The Upcoming Wrestlemania® XX event

31. WWE's Wrestlemania® XX weekend and related activities and events are scheduled for Saturday and Sunday, March 13-14, 2004. See Exhibit 4. The events formally begin with the WWE Hall of Fame Reception and Induction Ceremony at the Midtown Hilton in New York City on Saturday, March 13, 2004, and conclude with Wrestlemania® XX at Madison Square Garden on Sunday, March 14, 2004.

32. In connection with its Wrestlemania® XX Weekend events, WWE has advertised and promoted heavily, and will continue to advertise and promote heavily, the WWE Marks in interstate commerce.

33. For the past several years, WWE exclusively has sold WWE Merchandise at and in connection with its Live Events. Typical WWE Merchandise sold at a WWE Live Event might refer specifically or generally to the WORLD WRESTLING ENTERTAINMENT, the WWE, the WWE logo, WRESTLEMANIA, and/or one or a number of the other WWE Marks included in Exhibits 1 and 2 hereto.

34. WWE Merchandise is of the highest quality and grade. These genuine goods are currently being sold only at authorized locations throughout the United States including, but not limited to, the house show arenas and Live Event venues, and retail stores in the Southern District of New York.

35. As the foregoing demonstrates, the only effective means of protecting WWE's trademarks and service marks from unlawful counterfeiting by Defendants at Live Events is through the ex parte seizure process, which has provided WWE, finally, with a potent weapon in the fight against unlawful counterfeiting. To maintain any meaningful defense against the unlawful distribution and sale by Defendants of Counterfeit Merchandise at Live Events, which is an ongoing problem inherent in the live entertainment industry, WWE must be allowed to proceed with the ex parte seizure process.

36. Indeed, Defendants are habitual "repeat offenders" who refuse, even when apprehended, to identify themselves or accept service, much less appear in court in connection with the seizure of their unlawful goods: aware of the illegality of their activities, these individuals and groups, if caught, will quickly hide or dispose of their Counterfeit Merchandise, or else load it into a waiting vehicle and lock the vehicle or drive it away.

37. Defendants typically are street peddlers, without offices, identification, licenses or addresses. In this manner, they can avoid having to respond to an ordinary civil lawsuit and thus are essentially immune from an injunction unless it is accompanied by authority to seize Counterfeit Merchandise. See Declaration of Wayne Grooms at ¶ 11.

38. For example, throughout its 2000-01 nationwide series of Live Events, WWE served approximately 175 individuals and seized approximately 4,200 items of Counterfeit Merchandise. Most of the apprehended counterfeiters refused to identify themselves and re-

fused to accept service, and none of them came forward to respond formally in court. See Declaration of Wayne Grooms at ¶ 21-23.

39. Clearly, the Defendant bootleggers will continue, undaunted, to attempt to peddle Counterfeit Merchandise at WWE's Live Events, and WWE's only means of keeping their conduct under control is in the ex parte seizure process.

40. Moreover, the design, materials and quality of most of the Counterfeit Merchandise being unlawfully sold at Live WWE Events in different cities by Defendants is uniform from event to event and city to city. Many of the same individual Defendants sell the same Counterfeit Merchandise in different cities. Groups of these individuals travel together from event to event, including prominently in this district in the New York City area. See Declaration of Wayne Grooms at ¶¶ 25-27.

41. Based upon the foregoing, and based upon its experience enforcing earlier seizure orders, WWE believes and therefore avers that there are groups of individuals from the New York City area that follow Live WWE Events from city to city, throughout the country, selling Counterfeit Merchandise. These groups constitute bootlegging rings that operate out of this district by obtaining Counterfeit Merchandise from a small number of manufacturers in and around the New York City area and traveling from city to city as described above.

42. As described, these individuals will continue to attempt to peddle Counterfeit WWE Merchandise during Wrestlemania® XX weekend and its related activities and events in New York City from March 13-14, 2004, including at Madison Square Garden and the Midtown Hilton, hoping perhaps to avoid court-sanctioned seizure of the infringing goods by WWE.

43. Ex parte seizure relief thus is essential if WWE is to maintain a defense against and effectively police the unlawful activities of Defendants at Wrestlemania® XX. With-

out such relief, WWE will have no effective remedy against the continued distribution and sale of Counterfeit Merchandise that infringes WWE's registered and unregistered trademarks and service marks, threatens lost sales in the hundreds of thousands of dollars, and deceives the consuming public into mistakenly believing they are purchasing the highest quality goods.

D. Irreparable Harm To WWE

44. Defendants' use of counterfeits of the WWE Marks on the Counterfeit Merchandise will deceive the consuming public into believing that they are purchasing genuine goods which have been manufactured, authorized, or approved by WWE, and will likely cause confusion and mistake in that consumers are likely to assume that WWE has manufactured, authorized, or approved the Counterfeit Merchandise sold by Defendants.

45. In addition to causing WWE to suffer incalculable, irrecoverable and irreparable lost sales, Defendants' manufacture, distribution and sale of inferior quality Counterfeit Merchandise displaying the WWE Marks will irreparably injure WWE's reputation for the manufacture and sale of the highest quality souvenirs, merchandise, and memorabilia.

46. Based on WWE's prior encounters with sellers of Counterfeit Merchandise at recent Live Events, other World Wrestling Entertainment events, and in the retail and wholesale distribution context, on information and belief, WWE alleges that, if Defendants are notified that WWE has filed this lawsuit and has filed an Application for Temporary Restraining Order, Defendants will cause the unauthorized Counterfeit Merchandise to be dispersed and, thereafter, sold at other locations on or near the premises of the event arenas or elsewhere with the result that WWE will be unable to obtain an effective remedy for Defendants' wrongful conduct.

COUNT I

Trademark Infringement (Registered Marks)

47. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 46 of this Complaint.

48. Defendants' use of counterfeits of the WWE Marks on the Counterfeit Merchandise constitutes infringement of WWE's registered trademarks in violation of § 32 of the Lanham Act, 15 U.S.C. § 1114.

49. The threat of the loss of WWE's right to control the use of its marks and the reputation of its goods is real and substantial. This loss is further enhanced by the inferior quality of Defendants' Counterfeit Merchandise.

50. Defendants' acts described herein will infringe the WWE Marks, will injure WWE's business, reputation, and goodwill, and unless restrained and enjoined will continue to do so, all to WWE's monetary damage and irreparable harm.

COUNT II

Trademark Infringement (Unregistered Marks) And False Designation Of Origin

51. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 50 of this Complaint.

52. Defendants' use of the WWE Marks on the Counterfeit Merchandise constitutes infringement of WWE's unregistered trademarks in violation of § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

53. Defendants' use of the WWE Marks on the Counterfeit Merchandise creates a false designation of origin and a false representation of Defendants' goods, all in violation of § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

54. The threat of the loss of WWE's right to control the use of its marks and the reputation of its goods is real and substantial. This loss is further enhanced by the inferior quality of Defendants' Counterfeit Merchandise.

55. Defendants' acts described herein will infringe the WWE Marks, will injure WWE's business, reputation, and goodwill, and unless restrained and enjoined, will continue to do so, all to WWE's monetary damage and irreparable harm.

COUNT III

Federal Trademark Dilution

56. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 55 of this Complaint.

57. The WWE Marks on WWE Merchandise have become well and favorably known to consumers throughout the United States, including New York, as an indication of goods emanating from or authorized by a single source, *i.e.*, WWE.

58. As a result of the duration and extent of WWE's use and promotion of the WWE Marks, the WWE Marks are famous and highly distinctive.

59. Defendants are making commercial use of the WWE Marks in interstate commerce.

60. Defendants' use began long after the WWE Marks became famous.

61. Defendants' use of the WWE Marks dilutes the distinctive quality of the WWE Marks by diminishing the capacity of the marks to identify and distinguish WWE's goods and services, in violation of § 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).

62. Defendants willfully intended to trade on WWE's reputation and goodwill, and to cause dilution of WWE's famous WWE Marks.

63. Defendants' conduct has caused and continues to cause WWE immediate and irreparable injury. WWE lacks an adequate remedy at law.

COUNT IV

Trafficking In Counterfeit Goods

64. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 63 of this Complaint.

65. Defendants' souvenirs, merchandise, and memorabilia constitute goods bearing counterfeit marks. Defendants have trafficked these goods in violation of the Trademark Counterfeiting Act of 1984, 15 U.S.C. § 1116(d) and unless restrained and enjoined, will continue to traffic these goods, all to Plaintiff's monetary damage and irreparable harm.

COUNT V

**Common Law Trademark Infringement and
Dilution, and Unfair Competition, Under New York Law**

66. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 65 of this Complaint.

67. The WWE Marks are marks valid at common law.

68. Defendants' unauthorized use of the WWE Marks is likely to cause confusion, or mistake or to deceive as to the source of Defendants' goods and services, which constitutes trademark infringement and dilution under the common law of New York and under Chapter 20, Article 24, Section 360-1 of the General Business Laws of the State of New York.

69. Defendants' unauthorized use of the WWE Marks constitutes unfair competition under New York common law and under Chapter 20, Article 24, Section 360-1 of the General Business Laws of the State of New York.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff World Wrestling Entertainment Inc. respectfully prays:

1. That this Court grant a temporary restraining order and a preliminary and permanent injunction enjoining Defendants and each of his, her, or their partners, associates, agents, servants, and employees, and all others acting in concert therewith or having knowledge thereof, from manufacturing, distributing, offering for sale or selling Counterfeit Merchandise, or any other souvenirs, merchandise, or memorabilia bearing any of the WWE Marks or any other mark, word, or name similar to the WWE Marks in a manner which is likely to cause confusion or mistake or to deceive.

2. That this Court order Defendants to file with this Court and serve on WWE within thirty days after the service on Defendants of the requested injunction a report in writing under oath setting forth in detail the manner and form in which Defendants have complied with the injunction.

3. That this Court order that all Counterfeit Merchandise, or any other souvenirs, merchandise, or memorabilia referring to or bearing any of the WWE Marks or any

confusingly similar marks, found in the possession, custody, or control of Defendants be seized until a hearing can be held before this Court to determine the disposition of any goods so seized.

4. That this Court order the seizure of (a) any means of making Counterfeit Merchandise and (b) records documenting the manufacture, sale, or receipt of things involved in the sale, offering for sale, or distribution of Counterfeit Merchandise until a hearing can be held before this Court to determine the disposition of any goods so seized.

5. That this Court order that (a) all Counterfeit Merchandise, or any other souvenirs, merchandise, or memorabilia bearing any of the WWE Marks or any confusingly similar marks, and all plates, molds, matrices, and other means of making the same, found in the possession, custody, or control of Defendants, and (b) any goods seized pursuant to this Court's order shall be delivered up to WWE, or WWE's attorneys pending the outcome of this action.

6. That Defendants be required to account to and reimburse WWE for any and all profits which Defendants have derived from the sale of any Counterfeit Merchandise or any other souvenirs, merchandise, or memorabilia bearing any of the WWE Marks or any confusingly similar marks, and for any and all damages which WWE has sustained by reason of the acts complained of herein, or statutory damages.

7. That Defendants be required to pay treble the amount of any profits derived from the sale of any Counterfeit Merchandise.

8. That this Court award WWE its cost and reasonable attorneys' fees in this action.

9. That this Court grant such other and further relief as it deems just and appropriate under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff World Wrestling Entertainment, Inc. hereby demands a trial by jury of all issues so triable.

Dated: March 10, 2004
New York, New York

WORLD WRESTLING
ENTERTAINMENT, INC.

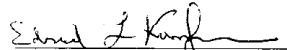

By: Eva M. Ciko (EC-0944)

KIRKPATRICK & LOCKHART LLP
599 Lexington Avenue
New York, New York 10022-6030
(212) 536-3900
and
Jerry S. McDevitt
Lucas G. Paglia
KIRKPATRICK & LOCKHART LLP
Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, PA 15222-2312
(412) 355-6500
(To be admitted pro hac vice)

VERIFICATION

I am Executive Vice President and General Counsel of Plaintiff World Wrestling Entertainment, Inc. The allegations in the foregoing Complaint that relate or refer to World Wrestling Entertainment, Inc. are true to my own knowledge and as to those allegations that relate or refer to Defendants' activities and that are alleged upon information and belief, I believe them to be true. I verify under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of March, 2004 in Stamford, Connecticut.



Edward L. Kaufman
Executive Vice President and General Counsel
World Wrestling Entertainment, Inc.

Exhibit 1

EXHIBIT 1

REGISTERED WWE MARKS

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
3 Count United States	09/25/00	76,135,296	09/04/01	2,485,237	Registered	41
3-Minute Warning United States	11/25/02	78,188,658	11/11/03	2,782,002	Registered	41
Action Zone United States	07/11/96	75,132,670	12/23/97	2,123,044	Registered	41
Ahmed Johnson United States	04/11/97	75,273,387	09/01/98	2,185,569	Registered	41
Al Snow United States	04/17/02	78,122,285	7/15/03	2,736,696	Registered	41
Armageddon United States	11/15/01	78,093,528	01/20/04	2,807,405	Registered	41
United States	11/15/01	78,093,517	12/30/03	2,801,333	Registered	9
Austin 3:16 United States	03/18/98	75,452,061	12/14/99	2,299,462	Registered	28
United States	03/18/98	75,452,060	12/14/99	2,299,461	Registered	25
United States	03/18/98	75,452,065	02/01/00	2,313,120	Registered	41
Back In Black United States	06/22/99	75,733,684	10/02/01	2,494,855	Registered	25
Backlash United States	09/30/02	78,169,282	10/07/03	2,771,710	Registered	9
United States	04/27/01	78,060,910	10/29/02	2,642,926	Registered	25
United States	03/28/01	76,231,734	10/01/02	2,627,703	Registered	41
Beast From The East United States	01/07/00	75,892,113	12/25/01	2,521,745	Registered	41
United States	01/07/00	75,892,111	01/15/02	2,529,059	Registered	25
Big Daddy Cool United States	06/04/96	75,114,249	06/01/99	2,248,463	Registered	41
Big Poppa Pump United States	04/20/99	75,686,899	09/03/02	2,615,674	Registered	16, 25
Big Show United States	01/08/02	78,101,432	03/11/03	2,696880	Registered	41
Blast Area United States	02/28/02	78,111,747	12/10/02	2,659,716	Registered	38
Body Donnas United States	04/11/97	75,273,302	01/26/99	2,220,008	Registered	41
Booker T United States	01/07/02	78,101,323	07/01/03	2,733,461	Registered	41
Bottom Line In Business Travel United States	10/05/88	73,756,083	05/23/89	1,540,916	Registered	39

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
Brock Lesner United States	05/02/02	78.125.656	10/07/03	2.771.592	Registered	41
Chris Benoit United States	11/14/01	78.093.224	12/16/03	2.796.040	Registered	41
Chris Jericho United States	10/21/98	75.575.310	09/12/00	2.384.740	Registered	41
Christian United States	07/06/01	78.072.669	10/22/02	2.639.683	Registered	41
Chyna United States	05/23/01	78.065.361	08/13/02	2.607.681	Registered	28
United States	05/23/01	78.065.356	09/17/02	2.621.456	Registered	9
United States	05/23/01	78.065.345	10/22/02	2.639.644	Registered	25
United States	05/23/01	78.065.328	11/26/02	2.654.470	Registered	16
United States	05/23/01	78.065.292	09/03/02	2.615.478	Registered	41
DDP United States	01/08/02	78.101.411	07/15/03	2.739.103	Registered	41
Diesel United States	03/12/96	75.071.032	08/12/97	2.087.146	Registered	41
Doink the Clown United States	02/23/95	71.637.348	08/20/96	1.994.733	Registered	41
ECW United States	04/05/00	76.018.783	03/27/01	2.438.554	Registered	09, 25, 28
United States	08/19/99	75.779.315	06/19/01	2.462.643	Registered	09
Edge United States	07/06/01	78.072.660	11/12/02	2.649.476	Registered	41
Excess United States (design)	09/05/01	78.082.591	12/10/02	2.659.575	Registered	41
United States	09/04/01	78.082.433	06/11/02	2.578.884	Registered	41
Fully Loaded United States	06/06/01	78.067.680	11/12/02	2.649.457	Registered	16
United States	03/28/01	78.055.588	05/28/02	2.573.879	Registered	9, 41
Glacier United States	08/19/96	75.152.894	04/22/97	2.055.608	Registered	41
Goldust United States	03/13/97	75.256.839	01/13/98	2.129.106	Registered	28
United States	04/17/02	78.122.267	01/14/03	2.675.279	Registered	41
Halloween Havoc United States	03/21/96	75.076.485	04/21/98	2.151.692	Registered	9
United States	03/29/96	75.081.134	04/14/98	2.150.093	Registered	25
United States	12/06/96	75.209.181	06/16/98	2.165.334	Registered	41
Hardy Boyz United States	05/31/02	78.132.526	10/14/03	2.773.574	Registered	16
United States	05/31/02	78.132.510	09/23/03	2.766.785	Registered	25
Invasion United States	06/18/01	78.069.658	07/08/03	2.735.618	Registered	9
United States	06/18/01	78.069.654	07/08/03	2.735.617	Registered	41

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
Judgment Day						
United States	06/06/01	78.067,622	03/25/03	2,700,343	Registered	16
United States	04/27/01	78,060,913	09/17/02	2,621,441	Registered	25
United States	03/29/01	78,055,746	02/11/03	2,686,549	Registered	9
Just Bring It						
United States	06/21/01	78,070,346	10/08/02	2,631,855	Registered	25
Kane						
United States	07/06/01	78,072,655	10/15/02	2,635,378	Registered	41
Kanyon						
United States	04/17/02	78,122,290	02/18/03	2,688,795	Registered	41
King of the Ring						
United States	04/26/96	75,095,025	02/25/97	2,040,704	Registered	41
United States	06/18/01	78,069,699	11/05/02	2,645,817	Registered	25
United States	06/06/01	78,067,668	05/06/03	2,713,507	Registered	16
United States	06/06/01	78,067,652	10/29/02	2,642,950	Registered	9
Kurt Angle						
United States	11/14/01	78,093,227	07/15/03	2,739,077	Registered	41
Layeth The Smacketh						
Down						
United States	04/20/01	78,059,611	09/10/02	2,618,330	Registered	25
Lita						
United States	06/21/01	78,070,296	10/08/02	2,631,853	Registered	41
Metal						
United States	11/14/01	78,093,245	08/12/03	2,751,377	Registered	41
Mr. Perfect						
United States	10/30/95	75,012,019	09/24/96	2,003,188	Registered	41
New Year's Evil						
United States	08/31/99	75,789,254	11/06/01	2,55,263	Registered	41
Nitro Girls						
United States	01/03/00	75,885,840	01/15/02	2,505,263	Registered	9
United States	01/03/00	75,884,505	01/09/01	2,419,146	Registered	41
Nitro Grill						
United States	01/07/00	75,892,110	11/13/01	2,505,916	Registered	35
No Mercy						
United States	11/15/01	78,093,551	01/06/04	2,803,552	Registered	9
United States	11/15/01	78,093,576	08/26/03	2,757,508	Registered	41
United States	11/15/01	78,093,571	07/29/03	2,745,108	Registered	16
United States	10/15/01	78,088,337	01/21/03	2,678,122	Registered	25
No Way Out						
United States	03/22/00	76,006,672	05/22/01	2,453,023	Registered	41
United States	04/27/01	78,060,904	12/11/01	2,517,590	Registered	25
United States	06/06/01	78,067,609	09/24/02	2,625,121	Registered	16
United States	06/06/01	78,067,601	11/12/02	2,649,456	Registered	9
NWO						
United States	03/14/97	75,257,783	12/09/97	2,120,098	Registered	25
United States	03/14/97	75,257,789	12/09/97	2,120,099	Registered	41

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
NWO 4 LIFE United States	01/07/00	75,891,457	01/15/02	2,529,057	Registered	41
NWO New World Order United States	01/07/00	75,892,109	09/24/01	2,622,813	Registered	41
Power Plant United States	03/21/96	75,076,576	09/29/98	2,192,545	Registered	25
United States	03/21/96	75,076,415	05/12/98	2,157,348	Registered	41
RAW United States	11/01/95	75,013,364	08/12/97	2,086,903	Registered	41
United States	02/23/98	75,438,726	10/24/00	2,396,746	Registered	16
Raw is War United States	05/16/97	75,292,997	02/02/99	2,221,223	Registered	41
United States	06/08/01	78,068,150	12/25/01	2,522,867	Registered	25
Ric Flair United States	01/07/02	78,101,322	07/01/03	2,733,460	Registered	41
Rikishi United States	01/07/02	78,101,318	01/20/04	2,807,414	Registered	41
United States	04/20/01	78,059,624	02/11/03	2,686,552	Registered	25
United States	04/20/01	75,982,598	12/10/02	2,660,925	Registered	28
Rob Van Dam United States	01/08/02	78,101,416	07/15/03	2,739,105	Registered	41
Royal Rumble United States	02/06/95	74,631,165	05/07/96	1,972,560	Registered	41
United States	04/26/93	74,382,186	10/31/95	1,930,440	Registered	9
United States	06/08/01	78,068,206	09/10/02	2,618,355	Registered	9
United States	06/06/01	78,067,597	01/28/03	2,681,135	Registered	16
RVD United States	01/07/02	78,101,310	07/08/03	2,735,677	Registered	41
Sable United States	07/12/99	75,748,394	09/05/00	2,382,918	Registered	41
Slammy United States	01/26/96	75,049,039	08/10/99	2,267,980	Registered	41
Slobber-Knocker United States	01/11/02	78,102,273	10/22/02	2,639,839	Registered	30
Smack Down Records & Design United States	10/05/00	76,141,139	06/10/03	2,725,034	Registered	9
Smackdown! Records United States	09/26/00	78,027,767	08/13/02	2,608,277	Registered	9, 41
Smackdown Your Vote United States	11/29/01	78,095,751	09/24/02	2,625,262	Registered	42
Souled Out United States	09/07/99	75,793,589	10/17/00	2,395,569	Registered	9
United States	09/07/99	75,794,400	11/14/00	2,403,894	Registered	41

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
Spring Stampede						
United States	09/28/00	76,137,450	11/13/01	2,506,260	Registered	41
United States	03/02/98	75,443,118	04/13/99	2,238,809	Registered	9
United States	04/07/98	75,464,066	04/20/99	2,240,770	Registered	25
S Summerslam						
United States (stylized)	12/12/01	78,099,697	11/26/02	2,654,561	Registered	28
Steve Austin						
United States	02/15/01	76,214,252	10/07/03	2,770,693	Registered	9, 16, 25, 28, 41
Summerslam						
United States	09/29/88	73,754,816	12/19/89	1,571,823	Registered	16, 25, 41
United States	04/26/93	74,382,185	03/21/95	1,884,646	Registered	9
United States	12/21/01	78,099,688	04/01/03	2,702,648	Registered	28
Sunday Night Heat						
United States	11/06/98	75,583,917	07/04/00	2,363,921	Registered	41
Superbrawl						
United States	03/21/96	75,076,486	04/07/98	2,148,568	Registered	9
United States	11/26/96	75,204,828	06/30/98	2,169,034	Registered	41
Survivor Series						
United States	05/07/93	74,387,731	11/01/94	1,860,719	Registered	9
United States	02/22/89	74,782,291	10/31/89	1,563,878	Registered	41
The Bad Guy						
United States	06/21/96	75,123,274	06/10/97	2,069,621	Registered	41
The Baldies						
United States	12/22/99	75,877,341	10/31/00	2,400,251	Registered	41
The Big Show						
United States	04/20/01	78,059,617	09/10/02	2,618,331	Registered	25
The Great American						
Bash						
United States	11/14/96	75,198,292	06/09/98	2,163,415	Registered	41
United States	11/14/96	75,198,862	10/13/98	2,194,671	Registered	25
The Hurricane						
United States	04/03/02	78,119,151	01/28/03	2,681,342	Registered	41
The Outsiders						
United States	01/07/00	75,892,114	11/20/01	2,508,842	Registered	41
The Rock						
United States	05/05/00	76,042,098	12/04/01	2,514,522	Registered	41
United States	05/05/00	76,042,096	05/28/02	2,572,838	Registered	28
United States	05/05/00	76,042,095	05/28/02	2,572,837	Registered	16
United States	05/05/00	76,042,094	10/15/02	2,633,988	Registered	9
The Undertaker						
United States	07/03/91	74,182,028	03/02/93	1,755,782	Registered	41
The World						
United States	05/18/01	78,064,335	12/18/01	2,520,374	Registered	42
Thunder						
United States	02/20/98	75,437,966	02/02/99	2,228,555	Registered	41

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
Titan Sports United States	06/03/83	73,428,676	07/17/84	1,286,533	Registered	41
Titan Tots United States	08/21/91	74,196,786	07/28/92	1,703,946	Registered	42
Titantron United States	01/11/00	75,894,123	07/02/02	2,587,199	Registered	9
Tough Enough United States	05/31/01	78,066,528	08/26/03	2,757,458	Registered	41
Triple H United States	11/15/01	78,093,659	11/04/03	2,780,659	Registered	41
Triple Threat United States	03/22/01	76,229,350	09/30/03	2,768,658	Registered	9, 41
Trish Stratus United States	11/15/01	78,093,506	07/29/03	2,745,107	Registered	41
Uncensored United States	11/13/96	75,197,774	08/11/98	2,179,974	Registered	41
Undertaker United States (design)	07/17/92	74,296,175	05/18/93	1,771,405	Registered	16
United States	12/18/91	74,231,527	11/03/92	1,729,405	Registered	20
United States	08/25/92	74,308,341	05/18/93	1,771,513	Registered	21
United States	07/17/92	74,296,168	03/02/93	1,755,482	Registered	25
United States	04/26/93	74,382,182	06/18/96	1,980,341	Registered	9
United States	01/26/96	75,049,041	03/14/00	2,327,493	Registered	28
Unforgiven United States	06/05/01	78,067,475	01/01/02	2,525,314	Registered	41
United States	06/05/01	78,067,468	12/24/02	2,666,552	Registered	16
United States	06/05/01	78,067,450	06/04/02	2,576,331	Registered	9
WCW Bash at the Beach United States	11/13/96	75,197,750	05/26/98	2,160,073	Registered	41
United States	11/13/96	75,197,773	07/28/98	2,176,144	Registered	41
WCW Design Mark Rep 1 United States	04/05/99	75,674,225	12/11/01	2,518,053	Registered	28
United States	04/05/99	75,674,464	07/24/01	2,472,120	Registered	41
United States	04/05/99	75,674,226	07/03/01	2,466,341	Registered	25
WCW Design Mark Rep 2 United States	04/05/99	75,675,744	06/12/01	2,460,234	Registered	25
United States	04/05/99	75,673,981	07/10/01	2,468,297	Registered	28
WCW Design Mark Rep 3 United States	04/05/99	75,674,245	09/11/01	2,488,418	Registered	41
United States	04/05/99	75,673,922	07/10/01	2,468,296	Registered	16
WCW Fall Brawl United States	11/12/97	75,389,184	01/19/99	2,218,710	Registered	41

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
WCW Halloween Havoc	-					
United States	11/12/97	75,389,185	01/19/99	2,218,711	Registered	41
WCW Monday Nitro						
United States	11/14/96	75,198,000	03/31/98	2,147,312	Registered	41
United States	11/26/96	75,204,829	07/28/98	2,176,174	Registered	41
WCW Motorsports						
United States	03/21/96	75,076,443	05/12/98	2,157,349	Registered	41
WCW Racing						
United States	04/19/00	76,029,744	07/31/01	2,473,355	Registered	25
United States	04/19/00	76,029,217	01/15/02	2,539,253	Registered	41
WCW Starrcade						
United States	11/13/96	75,197,524	05/26/98	2,160,071	Registered	41
United States	11/13/96	75,197,337	07/28/98	2,176,143	Registered	41
WCW Stylized						
United States	02/12/98	75,433,132	03/16/99	2,232,114	Registered	25
United States	12/07/92	74,337,565	08/03/93	1,785,929	Registered	41
WCW Uncensored						
United States	11/14/96	75,197,875	06/02/98	2,161,463	Registered	41
WCW World War 3						
United States	03/06/98	75,446,174	01/29/02	2,533,208	Registered	9
United States	12/06/96	75,209,639	07/14/98	2,172,384	Registered	41
United States	11/07/97	75,388,976	01/05/99	2,216,288	Registered	41
WCWNWO						
United States	10/10/00	76,143,375	09/10/02	2,616,810	Registered	16
United States	04/07/98	75,464,007	12/14/99	2,299,498	Registered	25
Who's Next						
United States	08/31/99	75,789,248	11/07/00	2,401,846	Registered	41
World Wrestling Federation Block Logo						
United States	03/01/91	74,143,629	06/30/92	1,697,715	Registered	25
United States	06/13/83	73,429,787	07/09/85	1,348,618	Registered	41
United States	05/19/88	73,729,298	01/02/90	1,574,169	Registered	3,6,9,14,16,18,20,21,24,25,28,30
World Wrestling Federation Block (Logo) & Slammers						
United States	04/02/98	75,461,448	10/12/99	2,284,860	Registered	28
World Wrestling Entertainment						
United States	04/04/02	78,119,623	10/07/03	2,772,677	Registered	25
United States	04/04/02	78,119,655	08/26/03	2,757,600	Registered	34
United States	04/04/02	78,119,644	08/26/03	2,757,599	Registered	18
United States	04/04/02	78,119,641	08/17/03	2,754,499	Registered	21
United States	04/04/02	78,119,535	02/24/04	2,828,358	Registered	41

Country	Filed	Appl #	Regdt	Reg #	Status	Classes
World Wrestling Federation						
United States	06/03/83	73,428,666	01/29/85	1,317,318	Registered	41
United States	05/19/88	73,729,304	11/07/89	1,564,148	Registered	14,16,6 9,18,20 24,25,28
Wrestlemania						
United States	06/19/85	73,543,858	03/17/87	1,432,884	Registered	14,16,25
United States	04/26/93	74,382,184	11/22/94	1,863,534	Registered	9
United States	06/08/01	78,068,199	09/24/02	2,625,125	Registered	9
Wrestlemania (stylized)						
United States	11/29/91	74,226,108	09/15/92	1,716,716	Registered	41
Wrestling Spotlight						
United States	11/07/95	75,016,314	07/27/96	1,997,196	Registered	41
United States	10/20/95	75,008,745	08/27/96	1,997,145	Registered	16
New Scratch Logo						
United States (stylized)	04/04/02	78,119,574	12/23/03	2,799,228	Registered	18
United States (stylized)	04/04/02	78,119,581	08/12/03	2,751,437	Registered	34
United States (stylized)	04/04/02	78,119,566	08/12/03	2,751,436	Registered	21
United States (stylized)	04/04/02	78,119,563	09/16/03	2,765,751	Registered	28
United States (stylized)	04/04/02	78,119,559	08/26/03	2,757,597	Registered	25
United States (stylized)	04/04/02	78,119,554	08/19/03	2,754,495	Registered	9
United States (stylized)	04/04/02	78,119,546	08/26/03	2,757,596	Registered	41
WWE						
United States	05/07/02	78,126,913	10/07/03	2,772,683	Registered	41
Y2J						
United States	06/21/01	78,070,367	10/22/02	2,639,674	Registered	25
United States	06/21/01	78,070,309	10/15/02	2,635,368	Registered	41

Exhibit 2

EXHIBIT 2

UNREGISTERED WWE MARKS

'Cause Stone Cold Said So	Baldo Bomb	Bushwhackers
100% HellRaiser	Banzai Drip	Cactus Jack
100% Texas Rattlesnake	Basham Brothers	Can You Take the Heat? (cookbook)
2Xtreme	Batista	Candy Ass
3:16	Because I am that Damn Good	Charlie Haas
3-D Dudley Death Drop	Benoit Elbow Drop	Chavo Guerrero
619	Benoit German Suplex	Chavo Guerrero, Sr.
Acolytes	Big Boss Man	Chokeslam from Hell
Afterburn	Big Nasty Bastard	Chris Benoit
Akio	Big Poppa Pump	Chris Jericho
All Aboard the Ho Train	Big Red Machine	Christian
Al Snow	Big Show	Christian Armlock
Always Pounding Ass	Bill DeMott	Christian Snapmare
American Bad Ass	Billy Gunn	Christopher Nowinski
American By Birth, Bad Ass By Choice	Billy Kidman	Chuck Palumbo
And You Will Never Eevvveeeerr be the Same Again	Blackman Combination	Class of 3:16
Angle Lock	Blackman Quick Kick	Clothesline from Hell
Angle Slam	Blackman Throat Thrust	Coach
APA	Booker T	Colonel Mustafa
APA Protection	Bottomline	Crippler
A-Train	Bra and Panties Match	Crippler Crossface
Austin	Bradshaw	D.O.A.
Austin Spinebuster	British Bulldogs	Danny Basham
Ayatollah of Rock 'n Rolla	Brock Lesnar	Darkness Choke
B-2	Broncobuster	Dawn Marie Wilson
B2	Brutus the Barber Beesecake	Dead Man, Inc.
Back that ass up	Bubba Cutter	Death Valley Driver
Bad Blood	Bubba Ray Dudley	Degeneration X
Bad to the Bone		Dink

Divas The Magazine	FBI	Hell Yeah
Divas Untamed	Faarooq	Here Comes the Pain
Diving Fame Asser	Fame-Ass-Er	HHH
D-LO	Fan Frenzy	High Angle Backdrop
Doink	Fatal 4 Way	HLA
Dominator	Final Cut	Ho Train Attack
Doug Basham	Freak Factory	Howard Finkel
Dude Love	Frog Splash	Hunter Hearst Helmsley
Dudley Boyz	Full Blooded Italians	I am the Game
Dudley Atomic Drop	Full Metal	I Got One Side, A Bad Side!
Dudley Death Drop	Funaki	I'm that Damn Good
Dudley Device	Gail Kim	If You Smell What the Rock is Cooking
Dudleyville	Game Over	II Cool
D-VON	Garrison Cade	Intelligence, Integrity, Intensity
D-Von Elbow Drop	Give Me a Hell Yeah!	It's Not Just a Sock...it's an Adventure
D-Von Neckbreaker	Global Warning	
D-Von Dudley	Godfather	It's Show Time
D-X	Goldberg	It's True! It's True!
Eddie Cradle Pin	Grand Master Sexay	Ivory
Eddie Guerrero	Ground Tazzmission	Jabroni Dr.
Edge	Guaran-Damn Tees It	Jackhammer
Edge O'Matic	Guerrero Special	Jacqueline
El Matador	Guillotine Choke	Jake "the Snake" Roberts
El Paso	Hardcore Holly	Jake the Snake
Elizabeth	Hardcore Legends	
Eric Bischoff	Hardy Boyz	Jakked
Escape the Rules	Hardy Boyz "Fear"	Jamie Noble
Eve of Destruction	Hardy Boyz Leg Drop	Jazz
Extreme Championship Wrestling	Have a Tall Glass of Shut Up Juice!	Jeff Jawbreaker
Evolution	HBK	Jeff Small Package
Eye of the Hurricane	Headbangers	Jeff Twist of Fate
F5	Heat	Jerichoholic
	Hell In A Cell	Jerry "The King" Lawler

Jim Ross	Lita	NWO New World Order
John Cena	Lita Diving Moonsault	Oh Hell Yeah!
Johnny "The Bull" Stamboli	Lita Tornado DDT	One and Only
Jonathan Coachman	Lite a Fatty for this Pimp Daddy	Open Mouth...Insert Sock!
Jon Heidenreich	Lo Down	Orlando Jordan
Josh Mathews	Luna	Paul Heyman
Just Another Victim	Mamacita!	Paul London
Just Bring It!	Mankind 2000	Pedigree
Just Say Ho!	Mark Henry	People's Champion
Justin Credible	Mark Jindrak	People's Elbow
Kane	Marlena	Pimpin' Ain't Easy
Kane Chokeslam	Matt Hardy	Radicalz
Kane Diving Clothesline	Matt Morgan	Randy Orton
Kanenites	Matt Twist of Fate	Raven Effect
Kane the Undertaker	Maven	Raw
Kane Throat Thrust	Mean Gene	Raw Deal Collectible Card Game
King of the Ring	Michael Cole	Raw is Jericho
Know Your Role	Mick Foley	Raw is War
Kurt Angle	Mick Foley's Christmas Chaos Book	Raw Magazine
Kurt Angle Backdrop	Miss Jackie	Razor Ramon
Kurt Belly to Belly	Molly Go Round	Regal Cutter
Kurt Diving Moonsault	Molly Holly	Regal Knee Attack
Kyo Dai	Mosh	René Dupré
Lamont	Mountie	Rey Mysterio
Lance Storm	Mr. America	Rhyno
La Résistance	Mr. Bad Ass	Rico
Last Ride	Mr. McMahon	Right to Censor
Latino Heat	Mudhole Stomping	Rikishi
Lilian Garcia	Nidia	Rikishi Driver
Linda McMahon	Night Force	Rikishi Phatu
Lingerie Match	Not for the Innocent	Rings of Saturn
Lionsault	Nunzio	Rob Conway

Rob Van Dam	Spike Piledriver	The American Way
Rock Bottom	Stalling Brainbuster	The Big Show
Rockers	Stacy Keibler	The Big Valbowski
Rocky Maivia	Steiner Recliner	The Dudley Dog
Rodney Mack	Stephanie McMahon	The Establishment
Roody Poo Candy Ass	Steve Austin	The Game
Rosey	Steven Richards	The Gore
Royal Rumble	Stink Face	The Great One
Rue DeBona	Stone Cold	The Heartbreak Kid
Saba Simba	Stone Cold Steve Austin	The Hurricane
Sable	Stone Cold Stunner	The King
Sakoda	Stunner	The Last Ride
Samurai Driver	Suck It!	The Legacy
Scott Steiner	Superhero In Training	The Most Electrifying Man in Sports Entertainment
Scotty 2 Hotty	Super Tazz Suplex	Theodore R. Long
Scotty Too Hotty	Survivor Series	The Patriot
Sean O'Haire	Swanton Bomb	The People's Champ
Self Proclaimed World's Greatest Tag Team	Sweet Chin Music	The People's Elbow
Sgt. Slaughter	Tables, Ladders and Chairs	The Regal Stretch
Shannon Moore	Tajiri	The RKO
Shawn Michaels	Tarantula	The Rock
Shelton Benjamin	Taunt Stone Cold	The Rock Clothesline
Sheriff Austin	Tazz	The Rock DDT
S.H.I.T. (Super Hero In Training)	Tazz Capture Suplex	The Rock Forearm Smash
Shotgun Saturday Night	Tazzmission	The Rock Millennium
Slobber Knocker	Tazzplex	The Rock Spinebuster
Smackdown	Team Extreme	The Rock's "Seal of Approval"
Smack Your TV	Terri	The Undertaker
So Reeking of Awesomeness	Test	The Walls of Jericho
Socko	Test Full Nelson Slam	Think Outside The Ring
Spike Dudley	Texas Rattlesnake	Thrasher
	Texas Tornado	Thug 4 Life
	The 10th Ring	
	The 450	

Thug It	Xtreme is not a mood! It's a Lifestyle
Thug Life	Y2J Security
Tiger Suplex Pin	You Better Recognize
TJ Drop	You Lack Intensity
TLC: Tables, Ladders, Chairs	You Wanna Piece of the Rock?
Todd Grisham	Your Damn Right I'm Over
Tombstone Piledriver	Your Mouth Shut It
Tommy Dreamer	Your Role...Know It
Tony Chimele	
Too Cool	
Torrie Wilson	
Tortured Souls	
Trax	
Triple H	
Triple Threat	
Trish Stratus	
Ultimo Dragon	
Un-Americans	
Undertaker Chokeslam	
Up Close & Uncensored	
Unprettier	
Val Venis	
Van Daminator	
Velocity	
Vengeance	
Victoria	
Vince McMahon	
West Coast Pop	
What?	
William Regal	
WWE Retribution	
X-Factor	

Exhibit 3

EXHIBIT 3

EXAMPLES OF PLAINTIFF'S MERCHANDISE

Key chains, video games, puzzles, board games, compact discs, stuffed animals, bears, pens, pencils, note books, books, booklets, postcards, magazines, posters, banners, binders, book covers, plastic rulers, photographs, photo albums, calendars, trading cards, bumper stickers, decals, mugs, glasses, shot glasses, cups, drink holders, sport bottles, portable coolers, thermos, portable chairs, sunglasses, visors, license plates, flags, towels, bedding sheet sets, t-shirts, shorts, socks, jackets, jerseys, shirts, sweatshirts, fleece sets, belts, belt buckles, caps, hats, race programs, computer game programs, die cast miniature race vehicles, mouse pads, road atlas, vehicle splash guards, candles, clocks, display cases, throws, prints, tapestry wall hangings, pillows, furniture, ashtrays, sleeping bags, curtains, salt and pepper shakers, cake kits, jewelry.

Refillable/disposable lighters, audio cassettes, videotapes, DVD's, championship belts, action figures, dolls, basketballs, bend-em' figures, masks, elbow pads, kites, skateboards, walkie-talkies, inflatable vinyl pools, greeting cards, invitations, athletic shoes, collectable stickers, watches, stickers, tattoos, gold and silver coins, signed lithographs, electronic tabletop games, face painting sets, disposable cameras, full size stand-up's, dart boards, pool cues, holiday card sets, Christmas ornaments, beach chairs, umbrellas, backpacks, banners, shower curtains, toothbrushes, pajamas, neckties, gloves, necklaces, bandannas, earrings, pendants, ice cream bars.

Exhibit 4

EXHIBIT 4

SCHEDULE OF EVENTS

1. **WWE Hall of Fame Reception and Induction Ceremony –**
Midtown Hilton, New York City, March 13, 2004
2. **WWE Wrestlemania® XX –**
Madison Square Garden, New York City, March 14, 2004